

2015 NOV -5 PM 2:06

CIF Co., Inc.
ATLANTA

BY _____

CASE NO.:

DKC 15 CV 3394

NOTICE OF REMOVAL

1. An action was filed on September 8, 2015 in the Prince George’s County Circuit Court, entitled *Alston v. Equifax Information Services LLC*, Case No. CAL15-25164 (the “State Court Action”).

3. This Notice is being filed with this Court within thirty (30) days after Equifax was served with a copy of Plaintiff's initial pleading setting forth the grounds for her action and her claims for relief.

4. This Court has original jurisdiction over this case pursuant to 28 U.S.C. § 1331, in that this is a civil action arising under the Constitution, laws or treaties of the

United States; specifically 15 U.S.C. § 1681 *et seq.*, otherwise known as the Fair Credit Reporting Act ("FCRA"), as follows:

(a) Plaintiff's Complaint, on its face, alleges a violation of the FCRA. (See Plaintiff's Complaint).

(b) The FCRA, pursuant to 15 U.S.C. § 1681(p), provides that any action alleging a violation of its provisions "may be brought in any appropriate United States district court without regard to the amount in controversy . . ."

5. Promptly after the filing of this Notice of Removal, Equifax shall give written notice of the removal to Plaintiff and to the Clerk of the Prince George's County Circuit Court, as required by 28 U.S.C. § 1446(d).

6. Attached hereto, as Exhibit A, are copies of the Summons and Complaint served upon Equifax in the State Court Action.

WHEREFORE, Equifax requests that the above-described action be removed to this Court.

Respectfully submitted this 5th day of November, 2015.

/s/ Nathan D. Adler

Nathan D. Adler Bar No. 22645
NEUBERGER, QUINN, GIELEN, RUBIN &
GIBBER, P.A.
One South Street, 27th Floor
Baltimore, Maryland 21202-3201
Tel: (410) 332-8516

*Attorneys for Equifax Information Services
LLC*

CERTIFICATE OF SERVICE

I hereby certify that on the __ day of November, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system and served a copy by U.S.

Mail to the following:

Candace E. Alston
10012 Cedarhollow Lane
Largo, MD 20774

/s/ Nathan D. Adler

Nathan D. Adler